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ATTORNEY FOR DEBTOR

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:

**JAMES MICHAEL LAJAUNIE**  
**Debtor**

§  
§

**CASE NO. 22-42622-ELM**  
**CHAPTER 13**

**BLUE OWL REAL ESTATE, LLC**  
**Movant**

§  
§  
§

**VS.**

§  
§  
§  
§

**Hearing Date: January 11, 2023**

**Hearing Time: 9:30 AM**

**JAMES MICHAEL LAJAUNIE**  
**Debtor**

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY**  
**CONCERNING RENTAL PROPERTY LOCATED AT**  
**1037 COUNTY ROAD 909, JOSHUA, TEXAS**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW James Michael LaJaunie, Debtor in the above-styled and numbered cause, and in response to the Motion for Relief from Stay filed by Blue Owl Real Estate, LLC (Movant") in regard to the collateral referenced in Movant's motion.

Debtor respectfully shows:

1. The allegations of **Movant** in paragraph one of the motion are admitted.

2. The allegations of **Movant** in paragraph two of the motion are admitted.

3. The allegations of **Movant** in paragraph three of the motion are admitted as to the supporting documentation provided in the motion.

4. The allegations of **Movant** in paragraph four of the motion are admitted as to the supporting documentation provided in the motion.

5. The allegations of **Movant** in paragraph five of the motion are neither admitted nor denied.

6. The allegations of **Movant** in paragraph six of the motion are neither admitted nor denied.

7. The allegations of **Movant** in paragraph seven of the motion are neither admitted nor denied.

8. The allegations of **Movant** in paragraph eight of the motion are admitted as to the documentation provided in the motion.

9. The allegations of **Movant** in paragraph nine of the motion are neither admitted nor denied.

10. The allegations of **Movant** in paragraph ten of the motion are admitted as to the documentation filed with the court.

11. The allegations of **Movant** in paragraph eleven of the motion are denied.

12. The allegations of **Movant** in paragraph twelve of the motion are denied.

13. The allegations of **Movant** in paragraph thirteen of the motion are denied.

14. The allegations of **Movant** in paragraph fourteen of the motion are denied.

15. The allegations of **Movant** in paragraph fifteen of the motion are denied.

16. The allegations of **Movant** in paragraph sixteen of the motion are denied.

17. The allegations of **Movant** in paragraph seventeen of the motion are denied.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that Movant's Motion For Relief From Automatic Stay be denied and for such other and further relief as the Court may deem just and appropriate.

Dated: December 22, 2022

Respectfully Submitted,

LEE LAW FIRM, PLLC

By: /s/ Christopher M. Lee

Christopher M. Lee

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 22, 2022, a true and correct copy of the foregoing Response to Motion For Relief From Stay was served on the following parties in interest by first class mail or electronic notice:

**CHAPTER 13 TRUSTEE**

Pam Bassel  
860 Airport Freeway, Ste 150  
Hurst, TX 76054

**U.S. TRUSTEE**

United States Trustee  
1100 Commerce, Room 976  
Dallas, TX 75242

**DEBTORS**

James LaJaunie  
1037 CR 909  
Joshua, TX 76058

**OPPOSING COUNSEL**

Norred Law PLLC  
515 E. Border Street  
Arlington, TX 76010

By: /s/ Christopher M. Lee

Christopher M. Lee

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